DOCUMENT RESUME

ED 296 835 RC 016 650

TITLE The Native American Indian Early Childhood Education Program: A Sunset Review.
INSTITUTION California State Legislative Analyst's Office, Sacramento.
PUB DATE Jun 87
NOTE 19p.
PUB TYPE Legal/Legislative/Regulatory Materials (090) -- Reports - Evaluative/Feasibility (142)

EDRS PRICE MF01/PC01 Plus Postage.
DESCRIPTORS *American Indian Education; Cultural Education; *Early Childhood Education; Educational Legislation; Elementary Education; *Mathematics Achievement; Program Evaluation; *Reading Achievement; *Remedial Programs; Rural Schools; State Boards of Education; State Legislation; State Programs; Tutorial Programs
IDENTIFIERS *California

ABSTRACT

This report contains the findings and recommendations of the California Legislative Analyst concerning the Native American Indian Early Childhood Education program. The program was established in 1972 to increase competence in reading and mathematics among American Indian students in California rural schools by intervening in prekindergarten through grade 4. In the 1986-87 school year, the program served 1,130 students in grades kindergarten through 4 from 23 schools in 11 districts. No prekindergarten projects were funded. Typically, the program provided supplemental services during regular school hours or tutoring after school. In analyzing the State Department of Education's (SDE) report on the program, the Legislative Analyst makes the following findings or criticisms: (1) an additional 2,400 students could potentially qualify for the program; (2) contrary to SDE policy, participating school districts use 2 to 5% of their state allocation to pay for indirect local administrative costs; (3) the SDE allocates funds based on the project rather than the number of students served, and the SDE favors renewal of current projects to the exclusion of new ones; (4) federally-funded Indian education programs provide some overlapping services to the same client population; (5) the SDE offers no specific evidence of the need for this program; and (6) there have been no evaluations of program effectiveness in the last 10 years. The Legislative Analyst recommends an extension of the program termination date to June 30, 1989, pending the completion of a comprehensive program evaluation by the SDE and the development of specified model projects that meet program goals. (SV)

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The Native American Indian Early Childhood Education Program: A Sunset Review

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Introduction

This report contains our findings and recommendations regarding the Native American Indian Early Childhood Education program pursuant to the "sunset" review procedures enacted by Chapter 1270, Statutes of 1983 (Senate Bill 1155). The program was established to improve the educational accomplishments of rural Native American Indian students in pre-kindergarten through grade 4. The program is scheduled to "sunset" on June 30, 1987.

As part of the sunset process, Chapter 1270 requires the State Department of Education (SDE) to review the Native American Indian Early Childhood Education program and submit its findings to the Legislature. The Legislative Analyst is also required to review the department's report and submit findings, comments, and recommendations regarding the program to the Legislature.

Specifically, Chapter 1270 requires SDE and the Legislative Analyst to address as many of the following issues as possible:

(1) The appropriateness of formulas used to identify children who have special needs.

(2) The appropriateness of formulas used to allocate funds and the adequacy of funding levels for the program.

(3) The effectiveness of the program.

(4) The appropriateness of local control.

(5) The appropriateness of state involvement in monitoring, reviewing, and auditing to assure that funds are being used efficiently, economically, and legally.

(6) The appropriateness of amounts spent to administer the program.

(7) The appropriateness of having the SDE administer the program.

(8) The interrelationships among state and federal categorical programs providing this type of assistance.

(9) The characteristics of the target population being served by the program.

(10) The need for the program.

(11) The purpose and intent of the program.

The law also requires the report submitted by SDE to include, but not be limited to, all of the following topics:

(1) A description of the program, including a description of how it is administered at the state and local levels.

(2) The history of the program and previous legislative action.

(3) Relevant statistical data.

(4) Related federal programs.

(5) Whether there is an unmet need for the intended purposes of the program and, if any, an estimated cost of serving the unmet need.

(6) Findings regarding the program, including comments on whether any identified problems pose implementation issues, or issues that require revision of law or regulations.

(7) Recommendations of ways to improve the program while maintaining its basic purposes.

Chapter I of this report provides background information on the Native American Indian Early Childhood Education program, a summary of the SDE's recommendations, and our comments on those recommendations. Chapter II contains our findings, and Chapter III contains our recommendations, which are based on both our own and SDE's findings regarding the program.

This report, as specified by law, is based largely on our review of the SDE report. Some information that is provided in the SDE report, such as the legislative history and a description of related federal programs, is not repeated here. We suggest, therefore, that this report be read in conjunction with the SDE report in order to obtain a more complete understanding of the program and of our comments on SDE's findings and recommendations.

This report was prepared by Nancy Rose Anton under the supervision of Ray Reinhard. ◆

Executive Summary

I. Legislative Analyst's Findings

- The Native American Indian Early Childhood Education program was established in 1972 to "improve the educational accomplishments of Native American Indian students in the rural educational systems of California." The authorizing statute further specifies that the intent of the program is to "establish projects in Native American Indian education which are designed to develop and test educational models which increase competence in reading and mathematics."
- In 1985-86, a total of $361,000 in General Fund support was provided under this program to 11 school districts. These funds were allocated to 23 school sites serving approximately 1,130 kindergarten-through-grade-4 students, at an average cost of $319 for each participating student.
- Current law does not specify how available funds are to be allocated to eligible districts. As implemented by the State Department of Education (SDE), funds for this program are allocated on a per-project basis, rather than on the basis of the number of students served. As a result, local districts have considerable flexibility in determining the number of students to be served and the level of service to be provided. For example, where one district might provide 20 students with 90 minutes of service per week, another district might provide 40 students with 45 minutes of service per week.
- The funding allocation system developed by SDE favors the renewal of currently-funded projects to the exclusion of new, and possibly improved, projects. As a practical matter, new projects cannot be funded until a currently-funded project terminates its participation in the program.
- The SDE does not determine to what extent, if any, the Native American Indian Early Childhood Education program supplements, rather than supplants, funds from other categorical aid programs that are also designed to improve the educational accomplishments of designated student groups.
- The SDE does not provide any specific evidence that eligible Native American Indian students perform more poorly in reading and math than do other students, or that the best method for increasing educational opportunities is through a program such as this one.

- There are no current data to indicate whether the program, as a whole, has increased the academic achievement levels of its participants because there is no existing evaluation process, and the last (and only) comprehensive evaluation of student achievement under this program was conducted over 10 years ago during the program's third year of operation.
- Although current law specifies that it is the intent of the program to establish projects which develop and test models that increase competence in reading and mathematics, the program has resulted neither in the development nor testing of any educational models.
- Although current law directs this program to serve pre-kindergarten through grade 4 students, no pre-kindergarten programs have been funded.

II. Legislative Analyst's Recommendations

We recommend that SDE conduct a comprehensive evaluation of the Native American Indian Early Childhood Education program, focusing on (1) the effectiveness of the program in improving the educational achievement levels of program participants and (2) the need to establish in pre-kindergarten through grade 4, specified model projects in Native American Indian education which increase competence in reading and mathematics. We further recommend that SDE develop a detailed plan, including a funding proposal, to conduct a comprehensive evaluation of the program. The plan should be submitted to the Joint Legislative Budget Committee, the legislative fiscal committees, and the Department of Finance by September 15, 1987. Pending the completion of such a review, we recommend that the sunset date for the Native American Indian Early Childhood Education program be extended for two years only, to June 30, 1989. ◆

Chapter I
Program Background and Comments on Recommendations Made by the Department of Education

Background

The Native American Indian Early Childhood Education program, established by Chapter 1052, Statutes of 1972 (Senate Bill 1258) and amended by Chapter 903, Statutes of 1977 (Assembly Bill 1544), is "directed to improve the educational accomplishments of Native American Indian students in the rural educational systems of California."

The authorizing statute states that the intent of the program is to "establish projects in Native American Indian education which are designed to develop and test educational models which increase competence in reading and mathematics." The program is restricted to students in pre-kindergarten through grade 4 in schools which (1) have 10 percent or more Native American Indian students and (2) are located in rural school districts which receive equalization aid. (For purposes of this program, the State Department of Education (SDE) limits funding to rural schools with fewer than 5,000 people residing within the school attendance area.) The statute specifies the importance of involving the Native American Indian parent-community in the planning, implementing, and evaluation of the programs.

As initially established in 1972, the program was restricted to funding a maximum of 10 three-year pilot projects. Subsequent legislation deleted this restriction. In the current year (1986-87), 11 school districts are participating in the program, with projects in operation at 23 school sites. In this same year, the program will serve approximately 1,130 kindergarten-through-grade-4 students, at an estimated cost of $365,000 (excluding state administrative costs). No pre-kindergarten projects are currently funded.

To qualify for the program, eligible districts annually must submit an application for funding to SDE. Although *any* eligible district may submit an application for funding, SDE has established a policy of giving first priority to districts that are already participating in the program. Consequently, if other districts desire to participate, they must wait until a currently-funded program drops out of the program and new applications are again considered.

According to SDE, program funding is provided on a per-project basis, rather than on the basis of the number of students served. Accordingly, variation in program funding

does not necessarily increase or reduce the number of students being served; rather, the same number of students are generally served, but each receives a corresponding increase or decrease in the quantity or quality of service (for example, students may receive 30 minutes—rather than 45 minutes—of service per week, or the staff/student ratio may increase or decrease). Typically, the type of service provided consists of supplemental educational services during regular school hours (provided either in-class or on a "pull-out" basis) or after-school tutoring in mathematics, reading and language development using materials which have a Native American cultural emphasis. On a programwide basis, however, SDE does not maintain information indicating the number of students receiving which types of assistance, or the total number of hours of assistance received.

During the current year, SDE will spend approximately $100,000 for portions of two positions in the Bureau of Indian Education to administer this program. These positions provide technical assistance to applicants and grantees, including two site visits per year to grantees and ongoing project monitoring.

Recommendations of the Department of Education

As noted in the introduction to this report, the sunset legislation specifies 11 items that the SDE report *may* address and seven items that it *must* address. Of the 11 optional items, the department addresses only one and a portion of a second—the purpose and intent of the program, and the adequacy of funding levels for the program. Of the seven required items, the department fully answers only two, leaving the remaining five either partially or only superficially answered. As a result, our review indicates that the department's report provides little analytical assistance to the Legislature in determining whether the program should be continued and, if so, how it may be improved.

The SDE's Native American Indian Early Childhood Education Sunset Report makes four recommendations regarding this program. These recommendations and our comments are as follows:

1. Cost-of-Living Adjustments

The SDE recommends that "adequate" cost-of-living adjustments (COLAs) be provided so that grantees can maintain their programs at current levels. The department notes that increases in program funding have not kept pace with inflation, based on the California Consumer Price Index (CPI), which is computed by the U.S. Bureau of Labor Statistics. Based on the 1974-75 funding level of $260,000, SDE estimates that the program's support level, adjusted for inflation, would have been approximately $625,000 in 1985-86, rather than the $361,000 actually provided.

Legislative Analyst's Comments. ***We concur that reasonable cost-of- living adjustments (COLAs) should be provided to this program. We recommend, however, that any such COLA be (a) discretionary and (b) based on the Implicit Price Deflator for State and Local Government Purchases of Goods and Services, rather than the California Consumer Price Index.***

We have consistently recommended against the establishment of *statutory* COLAs, because the existence of these entitlements tends to restrict the Legislature's flexibility to reorder priorities in times of fiscal stringency. For this reason, we recommend that the Legislature not establish a statutory COLA for the Native American Indian Early Childhood Education program.

In addition, we make no recommendation regarding the level of discretionary COLA

that the Legislature should grant to this program. We believe that this is a decision that only the Legislature can make, based on its priorities for the distribution of limited funds among many competing programs.

If the Legislature wishes to protect this program against the effects of inflation, however, we recommend that it use a measure of inflation other than the California CPI. This is because the California CPI (1) measures inflation faced by consumers, rather than school districts and (2) is based on prices in the state's major urban areas, rather than the rural areas in which this program is based. A better measure of inflation, in our opinion, is given by the Implicit Price Deflator for State and Local Government Purchases of Goods and Services, published by the U.S. Department of Commerce. This index, which forms the basis of the statutory COLA for school district revenue limits, also could be used to establish an appropriate discretionary COLA funding level for the Native American Indian Early Childhood Education program.

Further, it is important to note that SDE is not obligated either to renew each project's funding from year-to-year (as is current practice) or to provide full funding for a project. Consequently, to the extent that any state-provided COLA does not keep pace with inflation, SDE can (1) fund fewer programs or (2) rely on participating districts to provide some local funding support.

2. Program Evaluation

The department recommends that (1) districts receiving grants under this program be required to submit annual student achievement data and (2) SDE itself be required to utilize the data to prepare an annual report to the Legislature. Subsequent conversations with the department's staff indicate that the intent of this recommendation is to establish an annual evaluative process, using standardized tests of student achievement.

Legislative Analyst's Comments. ***We concur with this recommendation.*** Specifically, we recommend that SDE be required to develop a plan to evaluate the effectiveness of the Native American Indian Early Childhood Education program and submit the plan to the Legislature by September 15, 1987. Further, the results of the evaluations should be used by the department to determine future funding levels for individual projects. *Because there is no ongoing evaluative process, the value of either the overall program or any of its various components cannot be assessed at this time* (see Chapter III of this report for further discussion of this point).

The 1972 enabling legislation required student performance evaluations; this requirement, however, was omitted in subsequent legislation which reauthorized the program in 1977. Although SDE is not prohibited from doing so, the department has failed to require administratively that participating programs conduct any evaluation of student performance; consequently, no such evaluations are performed.

In a recent attempt to evaluate program success, SDE collected data reports from the 1985-86 California Assessment Program (CAP), the California Basic Education Data System (CBEDS) Performance Report Summaries, and the Consolidated Programs Description Database. This information was collected for each participating project school and five additional non-project schools. After considerable review, SDE determined that a meaningful analysis of student achievement as a result of the Native American Indian Early Childhood Education program could not be obtained from these data.

3. Expansion to Additional Districts Eligible Under Current Program

The department recommends that funding be provided to extend the program to other eligible school districts. Although the report does not include relevant cost or student participation data, information which we obtained from the department indicates that an estimated 2,400 Native American kindergarten-through-grade-4 students attending

65 rural schools in 47 districts would meet the eligibility requirements of this program. Currently, an estimated 1,130—or 47 percent—of these students receive services through the Native American Indian Early Childhood Education program. The SDE estimates that it would cost approximately $2.7 million (an increase of $2.4 million over current program funding levels) to provide services to *all* eligible students. (This cost estimate does not include a corresponding increase in state administrative expenses that would be necessary to provide additional technical and support services if such an increased number of schools were to be funded.)

Legislative Analyst's Comments. ***We do not concur with this recommendation.*** Absent data indicating that the projects funded by the Native American Indian Early Childhood Education program do, in fact, improve the educational accomplishments of their student participants, there is no analytical basis to expand the program at this time. In addition, we are unable to substantiate the need for a funding increase in excess of 600 percent (from $365,000 currently to $2.7 million) to provide service to just over double the number of students (from 1,130 currently to an estimated 2,400).

Further, our review indicates that, to the extent that increased funding levels are considered, it would be appropriate to provide only a level of funding sufficient to fund all eligible districts *electing to participate in the program*, rather than simply all eligible districts. The last time a district dropped out of the program and new applications were solicited was in 1983-84. At that time, only 8 of the 38 eligible districts submitted funding applications; of these, two districts ultimately were awarded grants. If all districts interested in participating had been funded in 1983-84, there would have been a total of 17 participating districts—30 fewer than the 47 eligible. Although we were unable to determine why more of the eligible districts did not submit funding applications at that time, SDE staff have indicated that some districts would *not* be interested in participating in the program, even if funds were available. For these reasons, any additional funding support should be based on the number of eligible districts desiring to participate in the program, and not simply on the number of eligible districts.

4. Expansion to Urban Districts

The department recommends that the provision limiting this program to "rural" school districts be removed, thus allowing all school districts (both "rural" and "urban") with a minimum of 10 percent Native American students to be eligible to participate. Again, the SDE report does not contain any relevant cost or student participation data regarding implementation of this recommendation. Estimates which we have obtained from SDE, however, indicate that there are a total of 900 Native American kindergarten-through-grade-4 students in qualifying "urban" districts. Adding these to the 2,400 "rural" students currently eligible to participate would result in increased costs of approximately $700,000, or total program costs of $3.4 million, assuming that the program was fully funded as proposed by SDE. (This cost estimate excludes any corresponding increase in state administrative costs, which also would be necessary.)

Legislative Analyst's Comments. ***We do not concur with this recommendation.*** Again, absent data indicating that the projects funded by the Native American Indian Early Childhood Education program do, in fact, improve the educational accomplishments of its student participants, there is no analytical basis to expand the program at this time. ◆

Chapter II
Legislative Analyst's Findings

This chapter contains our findings concerning the Native American Indian Early Childhood Education program's implementation and effectiveness.

Findings Regarding Program Implementation

Level of Participation. As mentioned, in 1985-86, the Native American Indian Early Childhood Education program operated at 23 school sites in 11 school districts, providing service to approximately 1,130 kindergarten- through-grade-4 students. Information from the SDE indicates that, under current eligibility criteria, there are an estimated 65 school sites in 47 districts with 2,400 Native American kindergarten-through-grade-4 students that could potentially qualify for the program as currently authorized.

Appropriateness of Administrative Costs. The department's report contains no information about the level of funding provided at the state or local level for overall administration of the program. We have subsequently been advised by the department, however, that (1) the state spends approximately $100,000 to administer this program, which is about 30 percent of the total local assistance expenditures and (2) it is the department's policy not to fund any local administrative costs. Our own review of several of the projects, however, indicates that participating school districts use from 2 percent to 5 percent of their state allocation to pay for indirect administrative costs (for example, to pay for a portion of a participating school principal's salary or a portion of the salary of the district's special education director).

Allocation of Funds. Current law does not specify how available funds are to be allocated to eligible districts. The SDE allocates funds for this program on a per-project basis, rather than on the basis of the number of students served. As a result, local districts have a great deal of flexibility in determining the number of students to be served and the level of service provided. For example, one district may provide supplemental math and reading instruction to 60 students for 30 minutes each week. For the same level of funding support, another district might provide 20 students with 90 minutes of service

per week, while a third district might double its student/staff ratio and provide 40 students with 90 minutes of service per week.

The funding allocation system developed by the department also favors the renewal of currently-funded projects to the exclusion of new projects; as a matter of practice, new projects cannot be funded until a currently-funded project drops out of the program.

Coordination With Other Programs. The Native American Indian Early Childhood Education program is administered by the Bureau of Indian Education in SDE. The Bureau administers one other state-funded Indian education program (Indian Education Centers) and provides liaison services with two federally-funded Indian education programs ("Title IV" and Johnson-O'Malley). The department's report indicates that none of the state-funded Indian education centers operates in a site served by a Native American Indian Early Childhood Education program.

Our review of the federally-funded Indian education programs indicates that these programs provide some overlapping services to the same client population; however, we were unable to determine if this overlap results in a duplication of services. The SDE report does not indicate whether duplication of effort exists among these programs. Table 1 provides comparative information on the Native American Indian Early Childhood Education program and the other three Indian education programs.

Table 1
Comparison – State and Federal Indian Education Programs
1985-86

Program	Authority/ Established	Client Population	Program Intent	Number Served	Annual Funding	Cost per Client Served	Eligible Applicants (Remarks)
Native American Indian Early Childhood Education Program "AB 1544"	State • 1972 (reauthorized 1974 and 1977)	Rural Indians (Pre-K through grade 4)	"Improve educational accomplishments"	1,130	$361,000	$306	Rural school districts with a school having a minimum of 10 percent indian students
Indian Education Centers "SB 2264"	State • 1974	Indians of all ages	"Improve academic achievement and self-concept of Indian students"	4,000	852,000	213	Any tribal group or incorporated Indian association[a]
"Title V" (Indian Education Act of 1972	Federal • 1972	K-12 students (must be state-recognized Native American)	"To meet special educational and cultural-related academic needs of Indian children"	31,340	3,800,000	120	Local education agencies (LEAs)[b]
Johnson-O'Malley	Federal • 1934	K-12 students (must be documented 1/4 blood Indian)	Supplemental education and educationally-related services	2,470	467,395	83	Public schools or specified Indian agencies[c]

[a] Funds 12 centers which provide community activities, counseling, health and library services, recreation and sports; no center operates in a site served by AB 1544.
[b] Fully federally-funded – no state administration role; liaison activities only: 10 of the 11 AB 1544 districts receive these funds.
[c] Fully federally-funded – no state administration role; liaison activities only.

In addition, there are several other state and federal categorical aid programs that are designed to improve educational accomplishments particularly in reading and mathematics, such as School Improvement Program (SIP), Economic Impact Aid, federal Chapter 1 and federal Title IV. Although school districts participating in the Native American Indian Early Childhood Education program may receive funds from any or all of these other programs, the SDE report does not indicate how these funds are distributed among the schools within the districts. Consequently, we were unable to determine the extent to which Native American Indian Early Childhood Education program funds supplement, rather than supplant, funds from these other sources. Thus, while it is possible that districts could direct other categorical funds toward meeting the same need as the Native American Indian Early Childhood Education program, we do not have the data to know if they, in fact, do so. Unlike the Native American Indian Early Childhood Education program, however, these other programs probably do not emphasize a Native American Indian cultural component.

Findings Regarding Need for Program

Current statute identifies two goals for this program: (1) to improve the educational accomplishments of rural Native American Indians students and (2) to establish specified education models to increase competence in reading and math. Although the SDE report notes many general characteristics of the Native American Indian population that could, presumably, be ameliorated through better educational opportunities, the report offers no specific evidence that eligible Native American Indian students in pre-kindergarten through grade 4 perform more poorly in reading and math than do other students. In addition, it is not clear from the report that rural Native American Indians perform any different than urban Native American Indians. Lastly, the report provides no evidence that the best method for increasing educational opportunities is through early childhood education projects such as this one.

Findings Regarding Program Effectiveness

Improving the Educational Accomplishments of Indian Students. The first statutory goal of this program is to "improve the educational accomplishments of Native American Indian students in the rural educational systems in California". Unfortunately, there have been no studies in the last 10 years that attempt to evaluate the effectiveness of this program in meeting this goal.

Developing and Testing Educational Models. The second goal of this program is to "develop and test educational models which increase competence in reading and mathematics." Our review indicates that, as currently administered, the program results neither in the development nor testing of various educational models. Further, SDE does not evaluate the effectiveness of the various educational models used by the districts to provide services to the students through this program. Consequently, there is no way to determine whether any one particular project model funded by this program is more effective than another. Further, present funding allocation practices do not allow for new, and possibly improved, project models to be financed until an existing project is terminated. As a result, contrary to existing statutory requirements, new educational models for increasing competence in reading and mathematics are not being developed and tested under this program.

Summary of Findings

Our review of the Native American Indian Early Childhood Education program identifies the following problems:

- There are no current data to determine if the program as a whole has increased the academic achievement levels of its participants because there is no existing evaluative process, and the last (and only) evaluation of student achievement in this program was conducted over 10 years ago.

- Although current law specifies that it is the intent of the program to establish projects which develop and test models to increase competence in reading and mathematics, to date, the program has resulted neither in the development nor testing of any educational models.
- Current funding allocation practices do not allow for new—and possibly improved—projects to be funded, until an existing project is terminated.
- Although current law directs this program to pre-kindergarten through grade 4 students, no pre-kindergarten programs have been funded.

Our review indicates that these problems relate primarily to the current *implementation* of the program, and do not necessarily reflect an inherently flawed program or a lack of need for the program. For these reasons, therefore, we do not believe that this program should necessarily be eliminated. Instead, we recommend that a comprehensive evaluation, as specified, be conducted, and that the results of that evaluation be used by the Legislature to determine the appropriate level of any future funding. ◆

Chapter III
Legislative Analyst's Recommendations

We recommend that SDE conduct a comprehensive evaluation of the Native American Indian Early Childhood Education program, focusing on (1) the effectiveness of the program in improving the educational achievement levels of program participants and (2) the need to establish in pre-kindergarten through grade 4, specified model projects in Native American Indian education which increase competence in reading and mathematics. We further recommend that SDE develop a detailed plan, including a funding proposal, to conduct a comprehensive evaluation of the program. The plan should be submitted to the Joint Legislative Budget Committee, the legislative fiscal committees, and the Department of Finance by September 15, 1987. Pending the completion of such a review, we recommend that the sunset date for the Native American Indian Early Childhood Education program be extended for two years only, to June 30, 1989.

We find that the department's sunset review report inadequately addresses the following major issues:

- The effectiveness of the Native American Indian Early Childhood Education program in improving the educational accomplishments of Native American Indian students in the rural educational systems in California.
- The failure of the program to develop and test educational models, as specified under current law.
- The rationale for allocating funds based on prior-year program participation and funding levels, rather than providing funds based on relative need or program effectiveness.
- The extent to which funds provided pursuant to this program supplement, rather than supplant, other Native American Indian and compensatory education program funds.
- The extent to which participants in this program receive duplicate or similar services from other Native American Indian programs.
- The extent to which participants in this program receive duplicate or similar services from other categorical aid programs.
- The costs (both state administration and local assistance) of expanding the program to all potentially eligible districts.
- The rationale and costs for expanding the program (1) to include participants in grades 5 and 6, and (2) to provide service to urban districts.

Our review indicates that it is both possible—and necessary—to address these issues, in order to assist the Legislature in its deliberations regarding continuation and improvement of the program.

Accordingly, we recommend that SDE conduct a comprehensive evaluation of the

program focusing on the effectiveness of the program in improving the educational achievement levels of Native Americans. To achieve this, we recommend that SDE develop a detailed plan, including a funding proposal, to conduct a comprehensive evaluation of the program. The plan should be submitted to the Joint Legislative Budget Committee, the legislative fiscal committees, and the Department of Finance by September 15, 1987 and should specifically include the estimated costs and time frame for conducting such an evaluation.

At a *minimum,* the proposed evaluation should focus on (1) the effectiveness of the program in increasing the educational accomplishments of its program participants, and (2) the need to establish in pre-kindergarten through grade 4, specified model projects in Native American Indian education which increase competence in reading and mathematics.

Pending completion of the evaluation, we further recommend that the sunset date for the Native American Indian Early Childhood Education program be extended for two years only, to June 30, 1989.

Based on a review of the findings of the evaluation, the Legislature will be able to determine the need to adjust the statutory goals or requirements of the program, as well as the associated costs of making such adjustments. ◆